

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE**

VANDA WATKINS p/k/a Criminal Manne, an individual; HAYWARD IVY p/k/a DJ SQUEEKY, an individual; and RAYNA B. RUFUS, in her capacity as Executor of the ESTATE OF GERALD BERRY p/k/a KILO G.,

*Plaintiffs,*

vs.

KANYE OMARI WEST p/k/a YE, an individual; TYRONE WILLIAM GRIFFIN p/k/a TY DOLLA \$IGN, an individual; YEEZY RECORD LABEL LLC, a California limited liability company; CREATE MUSIC GROUP, INC., a Delaware corporation; and DOES 1-10.

*Defendants.*

Case No. 2:24-CV-02880

Hon. Jon Phipps McCalla

Action Filed: November 13, 2024

FAC Filed: April 7, 2025

**NOTICE OF SETTLEMENT IN PRINCIPLE**

Plaintiffs Vanda Watkins, Hayward Ivy, and Rayna B. Rufus (“Plaintiffs”), together with Defendant Tyrone William Griffin Jr. p/k/a “Ty Dolla \$ign” (“Ty Dolla \$ign”) and Create Music Group, Inc. (“Create,” and together with Ty Dolla \$ign, the “Settling Defendants”) (collectively, the “Parties”) hereby respectfully submit this Notice of Settlement in Principle (“Notice”).

The Parties have resolved their differences and are presently negotiating a confidential settlement agreement, which will resolve Plaintiffs’ claims against the

Settling Defendants – but not co-defendants Kanye Omari West p/k/a/ YE or Yeezy Record Label LLC– *in their entirety*.

In light of the Parties’ agreement, the Parties respectfully request that the Court grant the Parties (30) days to both finalize their confidential agreement, and for Plaintiffs to file a Stipulation for Dismissal with Prejudice as to the Settling Defendants.

This request is made in good faith, not for the purpose of delay, and seeks to promote judicial economy.

Dated: July 30, 2025  
Miami, Florida

/s/ Bradley J. Eiseman

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*Attorneys for Defendant Create Music  
Group, Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2025, I caused a true and correct copy of the foregoing Notice to be electronically filed with the Clerk of Court and served upon all counsel of record via the Court's CM/ECF electronic filing system.

/s/James G. Sammataro

James G. Sammataro